

1 **KRYSTYNA STETKIEWICZ**  
2 3653 Callahan Avenue  
3 Las Vegas, Nevada 89120  
4 Telephone (702) 699-7783  
5 In Proper Person

**ORIGINAL**

6 **United States Bankruptcy Court**  
7 **District of Nevada**

8 In re:

9 JOHN M. LEFEBVRE and  
10 NOOJAN SRIKHAMPHA,

11 Debtors,

12 KRYSTYNA STETKIEWICZ

13 Plaintiff

14 v.

15 JOHN M. LEFEBVRE and  
16 NOOJAN SRIKHAMPHA

17 Defendants

Case No.: 10-12503-lbr  
Chapter: 7

18 **COMPLAINT**

19 COMES NOW Adversary Creditor, KRYSTYNA STETKIEWICZ, appearing In Proper  
20 Person, and her Complaint objecting to the discharge of certain debts claimed in Debtors JOHN M.  
21 LEFEBVRE and NOOJAN SRIKHAMPHA's Chapter 7 case filed in the above-entitled Court.

22 DATED this \_\_\_\_ day of May, 2010.

23 **KRYSTYNA STETKIEWICZ**  
24 3653 Callahan Avenue  
25 Las Vegas, Nevada 89120  
26 Telephone (702) 699-7783  
27 In Proper Person  
28

**MEMORANDUM OF POINTS AND AUTHORITIES****Factual History**

Creditor STETKIEWICZ is the former wife of Debtor JOHN LEFEBVRE's business partner, Glen Wolf. LEFEBVRE and Wolf are co-owners of The Flooring Center/Flooring America, located at 3170 East Sunset Road, #H, Las Vegas, Nevada 89120. In her Complaint for Divorce filed with the Eighth District Court of the State of Nevada, Case No. D-08-399650-D, she made the allegation that Wolf had opened several credit cards in her name through the internet. (Please see Complaint, Exhibit 1) He and LEFEBVRE then used those credit cards to purchase supplies and merchandise for either use or resale by The Flooring Center. The Court ruled that Wolf and his business associates did perpetrate a fraud upon STETKIEWICZ, obtaining and abusing her credit without her prior knowledge and express consent. It further ruled that Wolf was to pay all of those debts incurred in her name through the illegally obtained credit cards, holding her harmless. (Please see Decree of Divorce, Exhibit 2)

STETKIEWICZ'S counsel also filed an action in civil court for fraud, Case No. A571158, naming Wolf, LEFEBVRE and SRIKHAMPHA (aka PHA) as Defendants. (Please see Exhibit 3). The parties entered into a Stipulation and Order concerning the matter with the agreement that the Defendants would pay all of the outstanding debts on the credit cards, again holding STETKIEWICZ harmless. The matter was dismissed *without prejudice*, pending the complete payment of the debts.

When STETKIEWICZ received notification of the above-captioned bankruptcy action, she immediately called the Debtors' counsel in the matter, requesting additional information. In return, she received a copy of Schedule F of the bankruptcy filing. (Please see Exhibit 4) STETKIEWICZ was amazed that the Debtors were attempting to circumvent the terms of the Stipulation and Order from the District Court action in that if they were granted a discharge of those debts, she would be responsible once again to pay those debts that were incurred through the fraudulent actions of the Debtors and her ex-husband.

During her research of the bankruptcy proceedings, STETKIEWICZ found out that not only did the Debtors claim her as a creditor, they also claimed her as a Co-debtor on Schedule H of their bankruptcy filing. (Please see Exhibit 5) A co-debtor refers to any person signed onto a debt

1 obligation jointly with a debtor whether as the primary or secondary obligor. STETKIEWICZ was  
 2 neither a primary nor secondary obligor with regards to the credit cards. She never signed any  
 3 documents to obtain the credit cards or agreed to any of the debts incurred by the use of the cards.  
 4 Her name and credit worthiness were used fraudulently by the Debtors and her ex-husband to obtain  
 5 merchandise for their business.

6 Further examination of the Debtors' filing revealed that the Debtors' deliberately omitted on  
 7 their Statement of Financial Affairs the existence of the District Court civil suit. (Please see Exhibit  
 8 6) STETKIEWICZ believes that they did so in an attempt to hide the suit from the bankruptcy court  
 9 and the fact that the creditor claim made by them for STETKIEWICZ in the amount of \$62,320.00  
 10 was based on the fraud they perpetrated against her.

### 11 Legal Argument

12 STETKIEWICZ brings her claim based on US Bankruptcy Codes §523(a)(2) [false pretenses,  
 13 false representation, actual fraud] and §523(a)(4) [fraud as fiduciary, embezzlement, larceny].

14 Not only did the Debtors defraud this Honorable Court by misstating the true status of  
 15 STETKIEWICZ and the nature of that debt they incurred against her, they purposefully did not  
 16 divulge the existence of the civil suit where fraud was a cause of action and where any judgement  
 17 in that matter cannot be discharged in a bankruptcy.

18 Therefore, STETKIEWICZ respectfully requests that the Debtors' claim for discharge of the  
 19 debt they have incurred against her be denied.  
 20

21 WHEREAS, the Creditor, KRYSTYNA STETKIEWICZ, prays:

- 22 1. That the Court finds that JOHN M. LEFEBVRE and NOOJAN SRIKHAMPHA  
 23 purposefully and methodically misrepresented to this Honorable Court the true and  
 24 correct status of the Creditor and the nature of the debt they incurred against her;  
 25
- 26 2. That the Court finds that JOHN M. LEFEBVRE and NOOJAN SRIKHAMPHA  
 27 purposefully omitted information concerning the district court civil suit in an attempt  
 28 to hide its existence from the Court, thus committing a further fraud upon the Court;

4. For further relief as the Court deems proper in the premises.

DATED this 24 day of May, 2010.

KKs for Khamir

**KRYSZYNA STETKIEWICZ**

3653 Callahan Avenue

Las Vegas, Nevada 89120

Telephone (702) 699-7783

**In Proper Person**

**EXHIBIT 1**

ORIGINAL

FILED

SEP 10 4 57 PM '08

*CRF*  
CLERK OF THE COURT

1 COMP  
2 Geoffrey A. Potts, Esq.  
3 Nevada Bar No. 4032  
4 LAW OFFICES OF GEOFFREY A. POTTS, P.C.  
5 1055 Whitney Ranch Dr. #110  
6 Henderson, Nevada 89014  
7 Telephone: (702) 498-7946  
8 Attorney for Plaintiff

9 IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
10 IN AND FOR CLARK COUNTY

11 KRYSTYNA STETKIEWICZ,

12 Plaintiff,

13 vs.

14 GLEN WOLF,

15 Defendant..

CASE NO. *208-399650 D*

DEPT. NO. *J*

16 COMPLAINT FOR DIVORCE

17 COMES NOW, Plaintiff, KRYSTYNA STETKIEWICZ (hereinafter referred to as  
18 "Krystyna" or "Plaintiff") by and through her attorney, Geoffrey A. Potts, Esq., and for her  
19 cause of action against the Defendant, GLEN WOLF (hereinafter referred to as "Wolf" or  
20 "Defendant"), states and alleges as follows:

21 1. Krystyna, is now, and for more than six weeks preceding the commencement of  
22 this action has been, an actual, bona fide resident of the County of Clark, State of Nevada, and  
23 during all of said period of time has been actually, physically and corporeally present, residing  
24 and domiciled in the State of Nevada.

25 ///

26 ///

CE28

1           2.     Krystyna and Glen were married on June 10, 1999, in Miami, Florida, and the  
2 parties are still husband and wife even though they have lived separate and apart for over one  
3 year.  
4

5           3.     There are no children as a result of this marriage, Krystyna is not pregnant and  
6 there are no adopted minor children of the marriage.

7           4.     Parties hereto entered into a prenuptial agreement on June 9, 1999, a copy of  
8 which is attached hereto as Exhibit "A".  
9

10          5.     Krystyna brought in to the marriage cash assets and real property in excess of  
11 \$35,000.

12          6.     Before the marriage Wolf was in serious financial difficulties and brought little  
13 to no assets into the marriage.

14          7.     There is community property belonging to the parties hereto, to-wit:

15               a.     Real property located at 3653 Callahan Avenue, Las Vegas, NV 89120,  
16 with no encumbrance;  
17

18               b.     A condominium located at 4960 Harrison Drive, Apt. 118, Las Vegas,  
19 NV 89120, with no encumbrance;  
20

21               c.     Household furniture and furnishings for both properties;

22               d.     Checking and savings account;

23               e.     2001 Lexus RX 300 with no encumbrance;

24               f.     A second Lexus with no encumbrance;

25               g.     We are informed and believe and therefore allege that defendant Wolf  
26 had additional financial accounts containing community property; and,  
27  
28

1           h.     A 50% interest in The Flooring Center – Flooring America (due to fraud  
2 on the part of defendant Wolf and others, Krystyna signed away her rights to this company as  
3 part of their separation. This issue is the subject of a related action currently pending in the  
4 Eight Judicial District in and for Clark County Nevada as Case No. A571158. We are informed  
5 and believe and therefore allege that defendant Wolf and others involved in the company  
6 fraudulently and illegally used Krystyna's good credit to obtain credit cards in relation to the  
7 business and incurred debt in Krystyna's name believed to be in an amount of over \$100,000).

8  
9           8.     The Court should award to Plaintiff the following community property as her  
10 sole and separate property:

- 11           a.     Real property located at 3653 Callahan Avenue Las Vegas, NV 89120.
- 12           b.     Household furniture and furnishings related to said real property;
- 13           c.     50% of all checking and savings accounts including, especially, all those  
14 financial accounts opened by defendant Wolf;
- 15           d.     2001 Lexus RX 300; and
- 16           e.     Plaintiff's personal property and belongings.

17           9.     The Court should award to Defendant the following community property as his  
18 sole and separate property:

- 19           a.     A condominium located at 4960 Harrison Drive, Apt. 118, Las Vegas,  
20 NV 89120;
- 21           b.     Household furniture and furnishings related to said real property;
- 22           c.     50% of all checking and savings accounts;
- 23           d.     Lexus; and,
- 24           e.     Defendant's personal property and belongings.



10. That the Court should order an appraisal of The Flooring Center - Flooring America; and that Defendant immediately pay to Plaintiff the value of 1/2 of the company; that Defendant be ordered to immediately cease and desist from using Krystyna's name, financial information and any other information related to Krystyna's identity; that defendant Wolf immediately pay completely in full any debt incurred by him or by the company using Krystyna's name, financial information or any other information related to Krystyna's identity; and, that Defendant hold Krystyna harmless from any such debt.

WHEREFORE, Plaintiff respectfully requests the following orders from the Court:

1. That the bonds of matrimony now and heretofore existing between Plaintiff and Defendant be dissolved and that Plaintiff be granted an absolute Decree of Divorce and that each of the parties hereto be restored to the status of a single, unmarried person.

2. There is community property belonging to the parties hereto, to-wit:

a. Real property located at 3653 Callahan Avenue Las Vegas, NV 89120, with no encumbrance;

b. Condominium located at 4960 Harrison Drive, Apt. 118, Las Vegas, NV 89120, with no encumbrance;

c. Household furniture and furnishings for both properties;

d. Checking and savings account;

e. 2001 Lexus RX 300 with no encumbrance;

f. Second Lexus with no encumbrance;

g. We are informed and believe and therefore allege that defendant Wolf had additional financial accounts containing community property; and,

h. A 50% interest in The Flooring Center - Flooring America.

1           3.     The Court should award to Plaintiff the following community property as her  
2 sole and separate property:

- 3               a.     Real property located at 3653 Callahan Avenue Las Vegas, NV.  
4               b.     Household furniture and furnishings related to said real property;  
5               c.     50% of all checking and savings accounts including, especially, all those  
6               financial accounts opened by defendant Wolf;  
7               d.     2001 Lexus RX 300; and  
8               e.     Plaintiff's personal property and belongings.

9           4.     The Court should award to Defendant the following community property as his  
10 sole and separate property:

- 11               a.     Condominium located at 4960 Harrison Drive, Apt. 118, Las Vegas, NV  
12 89120;  
13               b.     Household furniture and furnishings related to said real property;  
14               c.     50% of all checking and savings accounts;  
15               d.     Lexus; and,  
16               e.     Defendant's personal property and belongings.  
17               f.     That the Court should order an appraisal of The Flooring Center –  
18 Flooring America; and that Defendant immediately pay to Plaintiff the value of 1/2 of the  
19 company; that Defendant be ordered to immediately cease and desist from using Krystyna's  
20 name, financial information and any other information related to Krystyna's identity; that  
21 defendant Wolf immediately pay completely and in full any debt incurred by him or by the  
22 company using Krystyna's name, financial information or any other information related to  
23 Krystyna's identity; and, that Defendant hold Krystyna harmless from any such debt.

1           5.     That the Court should order Defendant to be responsible for, and hold the  
2 Plaintiff harmless from, any other community debts and obligations.

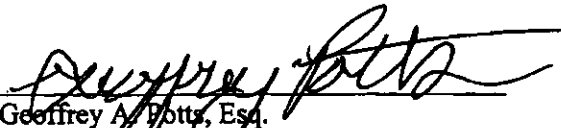
3           6.     That due to the fraudulent activities engaged in by Defendant Wolf, that he be  
4 ordered to pay all of Plaintiff's attorneys fees and costs.  
5

6           7.     That given the large differences in income between Plaintiff and Defendant, that  
7 this Court should compel Defendant Wolf to make support payments to Plaintiff.

8           8.     For such other and further relief as the Court deems just and proper in the  
9 premises.  
10

11           DATED this 9<sup>th</sup> day of September, 2008.

12                                   LAW OFFICES GEOFFREY A. POTTS

13  
14                                     
15                                   Geoffrey A. Potts, Esq.  
16                                   Nevada Bar No. 4032  
17                                   1055 Whitney Ranch Dr. #110  
18                                   Henderson, Nevada 89014  
19                                   Telephone: (702) 498-7946  
20                                   Attorney for Plaintiff  
21  
22  
23  
24  
25  
26  
27  
28

VERIFICATION

STATE OF NEVADA )  
 ) ss:  
COUNTY OF CLARK )

KRYSTYNA STETKIEWICZ, under penalties of perjury, being first duly sworn,  
deposes and says:

That I am the Plaintiff in the above-entitled action; that I have read the foregoing  
Complaint for Divorce and know the contents thereof; that the same is true of my own  
knowledge, except for those matters therein contained stated upon information and belief, and as  
to those matter, I believe them to be true.

DATED this 9 day of September, 2008.

KRYSTYNA STETKIEWICZ  
KRYSTYNA STETKIEWICZ

SUBSCRIBED and SWORN to before me  
on this 9th day of September, 2008.

NOTARY PUBLIC in and for Said  
County and State.



**EXHIBIT “A”**

06/09/99

## Premarital agreement

This agreement is between

Glen Steven Wolf  
Date of birth 9/14/52  
Chicago, IL

and  
Krystyna Stetkiewicz  
Date of birth 02/18/61  
Poland

In the event of the marriage  
ending in a divorce all  
personal property, assets, holdings  
and liabilities of Glen Steven Wolf  
and Krystyna Stetkiewicz before  
the marriage date will not be part  
of the divorce settlement.

Krystyna Stetkiewicz  
~~Krystyna Stetkiewicz~~  
Glen Steven Wolf  
Glen Steven Wolf



Althea L. Chung  
6/9/99

**EXHIBIT 2**

ORIGINAL

NEOJ  
CHRISTOPHER R. TILMAN, ESQ.  
Nevada Bar No. 05150  
1211 South Maryland Parkway  
Las Vegas, Nevada 89104  
(702) 214-4214  
Attorney for Defendant  
Glen Wolf

FILED

SEP 3 11 32 AM '09

*Earl H. ...*  
CLERK OF THE COURT

DISTRICT COURT

CLARK COUNTY, NEVADA

KRYSTYNA STETKIEWICZ,

Plaintiff,

vs.

GLEN WOLF,

Defendant.

Case No. D-08-399650-D  
Dept No. J

Date of Hearing: N/A  
Time of Hearing: N/A

**NOTICE OF ENTRY OF DECREE OF DIVORCE**

PLEASE TAKE NOTICE that on the 31st day of August, 2009, the Honorable Kenneth E. Pollock entered a Decree of Divorce, a copy of which is attached hereto.

DATED this 7 day of September, 2009.

*Christopher R. Tilman*  
CHRISTOPHER R. TILMAN, ESQ.  
Nevada Bar No. 005150  
1211 South Maryland Parkway  
Las Vegas, Nevada 89104  
Attorney for Defendant

RECEIVED  
SEP 4 2009

CLERK OF THE COURT

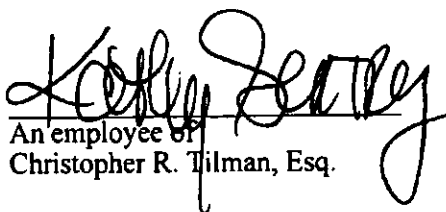


**CERTIFICATE OF MAILING**

I hereby certify that on that service of this **NOTICE OF ENTRY OF DECREE OF DIVORCE** was made this 2nd day of September, 2009, by depositing a copy thereof in a sealed envelope, first class postage prepaid, in the U.S. Mail, addressed to:

Geoffrey Potts, Esq.  
1055 Whitney Ranch Dr.  
Henderson, NV 89014

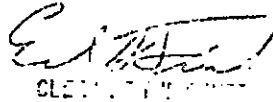
Glen Wolf  
5150 Shadow Hill Drive  
Las Vegas, NV 89120

  
An employee of  
Christopher R. Tilman, Esq.

COPY

1 DECD  
 2 CHRISTOPHER R. TILMAN, ESQ.  
 3 Nevada Bar No. 05150  
 4 1211 South Maryland Parkway  
 5 Las Vegas, Nevada 89104  
 6 (702) 214-4214  
 7 Attorney for Defendant  
 8 Glen Wolf

AUG 31 9 47 AM '09



CHRISTOPHER R. TILMAN

## DISTRICT COURT

CLARK COUNTY, NEVADA

12 KRYSTYNA STETKIEWICZ,

13 Plaintiff,

14 vs.

15 GLEN WOLF,

16 Defendant.

Case No. D-08-399650-D  
 Dept No. J

Date of Hearing: N/A  
 Time of Hearing: N/A

DECREE OF DIVORCE

18 This matter, having been submitted to the Court via a Summary Disposition, Plaintiff,  
 19 appearing through her attorney, Geoffrey A. Potts, Esq., and Defendant, appearing through his  
 20 attorney Christopher R. Tilman, Esq., and the Court, having and examined all of the pleadings, and  
 21 the cause having been submitted for decision and comment, and the Court being fully advised as  
 22 to the law in the facts of this case, finds:

23 That the Court has jurisdiction in the premises, both as to the subject matter thereof as well  
 24 as the parties herein;

25 That the Defendant now is, and has been, an actual and bona fide resident of the County of  
 26 Clark, State of Nevada and has been actually domiciled therein for more than six (6) weeks  
 27  
 28



1 immediately preceding the commencement of this action;

2 That both parties are entitled to a Decree of Divorce on the grounds as set forth in their  
3 Complaint and Answer;

4 That the Defendant has filed an Answer and has therefore waived findings of fact, and  
5 conclusions of law and written notice of entry of judgment in said cause; and,

6 That there are no minor children the issue of this marriage; there are no adopted children the  
7 issue of this marriage; and the Plaintiff is not pregnant.

8 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the bonds of matrimony  
9 heretofore now existing between the Plaintiff and Defendant be, and the same are, hereby wholly  
10 dissolved and an absolute Decree of Divorce is hereby granted to the Plaintiff, and each of the  
11 parties hereto is hereby restored to the status of a single, unmarried person.

12 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the parties acknowledge  
13 that they have had a full and fair opportunity to conduct discovery of assets and debts. The parties  
14 further acknowledge that it is desire to proceed with this stipulated Decree of Divorce based upon  
15 their desire to resolve the divorce based upon each other's respective assets and debts. The parties  
16 further confirm that the division of assets and debts are fair and equitable.

17 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that if any claim, action or  
18 proceeding is brought seeking to hold one of the parties hereto liable on account of any debt,  
19 obligation, liability, act or omission assumed by the other party, the responsible party shall, at his  
20 or her sole expense, defend the innocent party against any such claim or demand and he or she will  
21 indemnify, defend and hold harmless the innocent party.

22 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that neither party should be  
23 required to pay spousal support or alimony to the other party.

24 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Plaintiff shall receive  
25 as her sole and separate property the following:

26 1. 100% of the home and equity contained therein located at 3653 Callahan Avenue, Las  
27 Vegas, Nevada, and Defendant herein specifically waives any and all interest contained therein.

2. 2000 Lexus RX300 automobile, free and clear of encumbrance thereon.

3. One-half (50%) of the AXA Annuity, currently held in both parties names, approximate value \$37,682.00.

4. 100% of the AXA Annuity in her name, and Defendant herein specifically waives any and all interest contained therein.

5. Any and all bank accounts in her name.

6. All personal effects and property in her possession.

4. All furniture and furnishings in her possession.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Defendant shall receive as his sole and separate property the following:

1. 100% of his business as well as 100% of any stock in "The Flooring Center/ Flooring America, Inc. The Plaintiff had previously waived any and all interest contained therein.

2. One-half (50%) of the AXA Annuity, currently held in both parties names, approximate value \$37,682.00.

3. 100% of the home and equity contained therein located at 4960 Harrison Drive, Las Vegas, Nevada. Plaintiff herein specifically waives any and all interest contained therein.

4. 100% of the home and equity contained therein located at 5150 Shadow Hill Drive, Las Vegas, Nevada. Plaintiff herein specifically waives any and all interest contained therein.

5. 2008 Dodge Caravan, subject to encumbrance thereon.

6. 2004 Cadillac Escalade, subject to encumbrance thereon.

7. Any and all bank accounts in his name..

8. All personal effects and property in his possession.

9. All furniture and furnishings in his possession.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that as and for property settlement agreement, the community debts of the parties to be divided as follows:

The Plaintiff shall be responsible for the payment of, and hold the Defendant harmless from, the following debts:

1 1. Any and all debts incurred in her name.

2 That the Defendant shall be responsible for the payment of, and hold the Plaintiff harmless  
3 from, the following debts:

4 1. Any debts associated with his business "The Flooring Center/Flooring America, Inc."

5 2. Loan on the 2008 Dodge Caravan.

6 3. Bank of America, account ending 4626, approximate balance \$20,828.00.

7 4. US Bank, account ending 6280, approximate balance \$5,385.00.

8 5. US Airways Mastercard, account ending 2505, approximate balance \$17,315.00.

9 6. Chase, account ending 0328, approximate balance \$7,743.00.

10 7. Any debts associated with his business The Flooring Center/Flooring America, Inc.

11 8. Mortgage on the 5150 Shadow Hill Drive property.

12 9. Citi Mastercard, account ending 2182, approximate balance \$15,324.00.

13 10. Any and all debts incurred in his name.

14 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the parties will cooperate  
15 with the execution of any and all documents to effectuate this Decree of Divorce. This Court shall  
16 retain jurisdiction over this matter.

17 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that should any party  
18 reasonably retain counsel for the purpose of enforcing or preventing the breach of any provision of  
19 this Decree of Divorce then the prevailing party shall be entitled, in addition to any other relief as  
20 may be granted, to be reimbursed by the other party for all costs and expenses incurred thereby,  
21 including, but not limited to, reasonable attorney's fees and costs for services rendered to the  
22 prevailing party.

23 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Plaintiff's former name

24 ///

25

26 ///

27

28

*Handwritten signature*

1 of: KRYSTYNA STETKIEWICZ be restored to her.

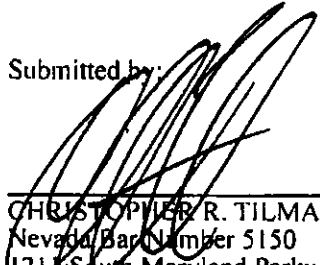
2 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that each party shall bear their  
3 own attorney's fees and costs.

4 Dated this 26<sup>th</sup> day of August, 2009.

5  
6 **KENNETH E. POLLOCK**

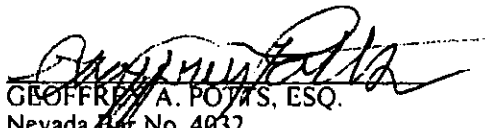
7 DISTRICT JUDGE

8 Submitted by:

9  
10   
11 CHRISTOPHER R. TILMAN, ESQ.  
12 Nevada Bar Number 5150  
13 1217 South Maryland Parkway  
Las Vegas, NV 89104  
Attorney for Defendant

14   
15 GLEN WOLF, Defendant

16 Approved as to form and content:

17   
18 GEOFFREY A. POTTS, ESQ.  
19 Nevada Bar No. 4032  
20 1055 Whitney Ranch Dr. #110  
21 Henderson, NV 89014  
22 Attorney for Plaintiff

23   
24 KRYSTYNA STETKIEWICZ, Plaintiff

## **EXHIBIT 3**

Logout My Account Search Menu New District Civil Search Refine Search Back

Location : District Court Civil Help

**REGISTER OF ACTIONS**

CASE NO. 08A571158

Krystyna Stetkiewicz vs Glen Wolf, Noonjan Pha, et al

§  
§  
§  
§  
§  
§  
§Case Type: **Other Civil Filing**  
Subtype: **Conversion of Property**  
Date Filed: **09/08/2008**  
Location: **Department 16**  
Conversion Case Number: **A571158****PARTY INFORMATION**Conversion **No Convert Value @ 08A571158**  
Extended Removed: 04/24/2009  
Connection Converted From Blackstone  
Type**Lead Attorneys**Defendant **Lefebvre, John****Norberto Cisneros***Retained***\*\* Confidential Phone  
Number \*\***Defendant **Pha, Noonjan S****Norberto Cisneros***Retained***\*\* Confidential Phone  
Number \*\***Defendant **Wolf, Glen****Norberto Cisneros***Retained***\*\* Confidential Phone  
Number \*\***Plaintiff **Stetkiewicz, Krystyna****Hans R. Baldau***Retained***\*\* Confidential Phone  
Number \*\*****EVENTS & ORDERS OF THE COURT****DISPOSITIONS**10/20/2009 **Order of Dismissal Without Prejudice** (Judicial Officer: Williams, Timothy C.)  
Debtors: Glen Wolf (Defendant), Noonjan S Pha (Defendant), John Lefebvre (Defendant)  
Creditors: Krystyna Stetkiewicz (Plaintiff)  
Judgment: 10/20/2009, Docketed: 10/22/2009**OTHER EVENTS AND HEARINGS**09/08/2008 **Complaint**  
*COMPLAINT FILED Fee \$148.00*  
08A5711580001.tif pages  
09/08/2008 **Initial Appearance Fee Disclosure**  
*INITIAL APPEARANCE FEE DISCLOSURE*  
08A5711580002.tif pages  
09/17/2008 **Amended Complaint**  
*FIRST AMENDED COMPLAINT*  
08A5711580003.tif pages  
10/27/2008 **Affidavit**  
*AFFIDAVIT OF SERVICE - JOHN LEFEBRE*  
08A5711580006.tif pages  
10/27/2008 **Affidavit**  
*AFFIDAVIT OF SERVICE - GLEN WOLF*



11/04/2008	08A5711580007.tif pages <b>Three Day Notice of Intent to Default</b> THREE DAY NOTICE OF INTENT TO ENTER DEFAULT AGAINST DEFTS
11/04/2008	08A5711580008.tif pages <b>Three Day Notice of Intent to Default</b> THREE DAY NOTICE OF INTENT TO ENTER DEFAULT AGAINST DEFTS
11/04/2008	08A5711580009.tif pages <b>Three Day Notice of Intent to Default</b> THREE DAY NOTICE OF INTENT TO ENTER DEFAULT AGAINST DEFTS
11/06/2008	08A5711580010.tif pages <b>Answer</b> ANSWER
11/06/2008	08A5711580004.tif pages <b>Answer</b> ANSWER
11/06/2008	08A5711580005.tif pages <b>Initial Appearance Fee Disclosure</b> INITIAL APPEARANCE FEE DISCLOSURE
01/26/2009	08A5711580011.tif pages <b>Notice</b> NOTICE OF CHANGE OF FIRM NAME AND ADDRESS
10/20/2009	08A5711580012.tif pages <b>Stipulation and Order</b>
11/05/2009	<b>Notice of Entry of Order</b> Notice of Entry of Order of Dismissal

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**FINANCIAL INFORMATION**

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	<b>Conversion Extended Connection Type No Convert Value @ 08A571158</b>		
	Total Financial Assessment		446.00
	Total Payments and Credits		446.00
	<b>Balance Due as of 05/23/2010</b>		<b>0.00</b>
09/08/2008	Transaction Assessment		446.00
09/08/2008	Conversion Payment	Receipt # 01459616	(148.00)
11/06/2008	Conversion Payment	Receipt # 01471884	(194.00)
11/06/2008	Conversion Payment	Receipt # 01471885	(104.00)

**EXHIBIT 4**

**CLEMENT LAW OFFICES**

9960 W. Cheyenne Ave., Suite 190  
Las Vegas, Nevada 89129

TELECOPIER:  
(702) 341-6558

TELEPHONE:  
(702) 341-6997

**To:** Kristina Steckiszz  
  
**From:** Stefanie H. Clement, Esq.  
**Fax #:** (702) 699-7783  
**Re:** John Lefebvre  
  
**Date:** May 14<sup>th</sup>, 2010  
**Pages:** 7 (Including cover page)

**Message:**

Ms. Steckiszz,

Enclosed please find the requested information pertaining to John Lefebvre Bankruptcy. Should you have any questions or concerns please do not hesitate to contact our office.

Clement Law Office  
*Stefanie H. Clement*  
9960 West Cheyenne Ave., Suite 190  
Las Vegas, Nevada 89129

BGF (Official Form 67) (12/07)

In re

JOHN M LEFEBVRE,  
NOOJAN SREKHAMPHA

Case No. 10-12503

Debtors

**SCHEDULE F - CREDITORS HOLDING UNSECURED NONPRIORITY CLAIMS**

State the name, mailing address, including zip code, and last four digits of any account number, of all entities holding unsecured claims without priority against the debtor or the property of the debtor, as of the date of filing of the petition. The complete account number of any account the debtor has with the creditor is useful to the trustee and the creditor and may be provided if the debtor chooses to do so. If a minor child is a creditor, state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See, 11 U.S.C. §112 and Fed. R. Bankr. P. 1007(m). Do not include claims listed in Schedules D and E. If all creditors will not fit on this page, use the continuation sheet provided.

If any entity other than a spouse in a joint case may be jointly liable on a claim, place an "X" in the column labeled "Codebtor." Include the entity on the appropriate schedule of creditors, and complete Schedule H - Codebtor. If a joint petition is filed, state whether the husband, wife, both of them, or the marital community may be liable on each claim by placing an "H," "W," "J," or "C" in the column labeled "Husband, Wife, Joint, or Community."

If the claim is contingent, place an "X" in the column labeled "Contingent." If the claim is unliquidated, place an "X" in the column labeled "Unliquidated." If the claim is disputed, place an "X" in the column labeled "Disputed." (You may need to place an "X" in more than one of these three columns.)

Report the total of all claims listed on this schedule in the box labeled "Total" on the last sheet of the completed schedule. Report this total also on the Summary of Schedules and, if the debtor is an individual with primarily consumer debts, report this total also on the Statistical Summary of Certain Liabilities and Related Data.

☐ Check this box if debtor has no creditors holding unsecured claims to report on this Schedule F.

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE, AND ACCOUNT NUMBER (See instructions above.)	C O D E B T O R	H U S B A N D W I F E J O I N T C O M M U N I T Y	DATE CLAIM WAS INCURRED AND CONSIDERATION FOR CLAIM. IF CLAIM IS SUBJECT TO SETOFF, SO STATE.	C O N T I N G E N T	U N L I Q U I D A T E D	D I S P U T E D	AMOUNT OF CLAIM
Account No. xxxxxxxxxxxx9063  AMERICAN EXPRESS C/O BECKETT AND LEE LLP PO BOX 3001 MALVERN, PA 19365		C	Opened 7/01/04 Last Active 8/06/09 CREDIT CARD PURCHASES				40,988.00
Account No. xxxxxxxxxxxx2903  AMEX C/O BECKETT & LEE PO BOX 3001 MALVERN, PA 19365		C	Opened 7/01/04 Last Active 8/22/09 CREDIT CARD PURCHASES				38,910.00
Account No. 4510  BANK OF AMERICA PO BOX 18026 WILMINGTON, DE 19850		C	Opened 7/01/04 Last Active 5/14/09 CREDIT CARD PURCHASES				22,973.00
Account No. 3768  BANK OF AMERICA PO BOX 18026 WILMINGTON, DE 19850		H	Opened 7/01/04 Last Active 6/26/09 CREDIT CARD PURCHASES				16,490.00
Subtotal (Total of this page)							119,232.00

5 continuation sheets attached

BKF (Official Form 67) (12/07) - Cont.

In re **JOHN M LEFEBVRE,  
NOOJAN BRIKHAMPHA**Case No. 10-12503

Debtors  
**SCHEDULE F - CREDITORS HOLDING UNSECURED NONPRIORITY CLAIMS**  
 (Continuation Sheet)

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE, AND ACCOUNT NUMBER (See instructions above.)	C O O R D I N A T O R	H W J C	DATE CLAIM WAS INCURRED AND CONSIDERATION FOR CLAIM, IF CLAIM IS SUBJECT TO SETOFF, SO STATE.	C O N T I N G E N T	U N L I Q U I T A T E D	D I S P U T E D	AMOUNT OF CLAIM
Account No. 3631  BANK OF AMERICA PO BOX 16026 WILMINGTON, DE 19850		C	Opened 8/01/04 Last Active 6/26/09 CREDIT CARD PURCHASES				13,129.00
Account No. 6477  BANK OF AMERICA PO BOX 16026 WILMINGTON, DE 19850		H	Opened 8/01/04 Last Active 5/14/09 CREDIT CARD PURCHASES				11,557.00
Account No. 4041  BANK OF AMERICA PO BOX 881001 Dallas, TX 75285		C	2009 CREDIT CARD PURCHASES				22,513.96
Account No. 7408  BANK OF AMERICA PO BOX 881001 Dallas, TX 75285		C	2009 CREDIT CARD PURCHASES				12,525.70
Account No. xxxxxx8401  BARCLAYS BANK DELAWARE ATTENTION: CUSTOMER SUPPORT DEPARTMENT PO BOX 8833 WILMINGTON, DE 19899		C	Opened 3/01/08 Last Active 5/15/08 CREDIT CARD PURCHASES				31,520.00
Subtotal (Total of this page)							91,245.66

Sheet no. 1 of 5 sheets attached to Schedule of  
 Creditors Holding Unsecured Nonpriority Claims

B-6F (Official Form 6F) (12/97) - Cont.

In re **JOHN M LEFEBVRE,  
NOOJAN SRIKHAMPHA**Case No. 10-12503

Debtors  
**SCHEDULE F - CREDITORS HOLDING UNSECURED NONPRIORITY CLAIMS**  
(Continuation Sheet)

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE AND ACCOUNT NUMBER (See instructions above.)	C O D E D E B T O R	H W J C	DATE CLAIM WAS INCURRED AND CONSIDERATION FOR CLAIM. IF CLAIM IS SUBJECT TO SETOFF, SO STATE.	C O N T I N G E N T	U N L I Q U I D A T E D	D I S P U T E D	AMOUNT OF CLAIM
Account No. xxxxxxxx3380  CHASE PO BOX 18298 WILMINGTON, DE 19850		C	Opened 7/01/04 Last Active 5/20/09 CREDIT CARD PURCHASES				34,472.00
Account No. xxxxxxxx3382  CHASE PO BOX 18298 WILMINGTON, DE 19850		H	Opened 7/01/04 Last Active 5/05/09 CREDIT CARD PURCHASES				31,553.00
Account No. xxxxxxxx8002  CHASE 800 BROOKSEDGE BLV WESTERVILLE, OH 43081		C	Opened 5/01/94 Last Active 5/28/09 CREDIT CARD PURCHASES				20,211.00
Account No. xxxxxxxx0142  CHASE 800 BROOKSEDGE BLV WESTERVILLE, OH 43081		C	Opened 5/01/04 Last Active 5/04/09 CREDIT CARD PURCHASES				18,783.00
Account No. xxxxxxxx4003  CHASE 800 BROOKSEDGE BLV WESTERVILLE, OH 43081		H	Opened 5/01/01 Last Active 5/14/09 CREDIT CARD PURCHASES				12,705.00
Subtotal (Total of this page)							117,724.00

Sheet no. 2 of 5 sheets attached to Schedule of  
Creditors Holding Unsecured Nonpriority Claims

BKF (Official Form 67) (12/97) - Cont.

In re **JOHN M LEFEBVRE,  
NOOJAN BRIKHAMPHA**Case No. 10-12503

Debtors  
**SCHEDULE F - CREDITORS HOLDING UNSECURED NONPRIORITY CLAIMS**  
(Continuation Sheet)

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE, AND ACCOUNT NUMBER (See instructions above.)	C O D E D E B T O R  H W J C	Husband, Wife, Joint, or Community	DATE CLAIM WAS INCURRED AND CONSIDERATION FOR CLAIM. IF CLAIM IS SUBJECT TO SETOFF, SO STATE.	C O U N T Y - R E S I D E N T	U N L I Q U I T A T E D	D I S C L A I M E D	AMOUNT OF CLAIM
Account No. xxxxxxxx9221  CITI PO BOX 6241 SIOUX FALLS, SD 57117	C		Opened 9/01/99 Last Active 5/14/09 CREDIT CARD PURCHASES				36,476.00
Account No. xxxxxxxx8887  CITI PO BOX 6241 SIOUX FALLS, SD 57117	H		Opened 10/01/04 Last Active 5/14/09 CREDIT CARD PURCHASES				31,752.00
Account No. xxxxxxxx0782  CITI PO BOX 6241 SIOUX FALLS, SD 57117	C		Opened 7/01/04 Last Active 5/28/09 CREDIT CARD PURCHASES				13,181.00
Account No. xxxxxxxx7061  DISCOVER FIN SVCS LLC PO BOX 15316 WILMINGTON, DE 19880	C		Opened 6/01/99 Last Active 1/06/10 CREDIT CARD PURCHASES				469.00
Account No. xxxxxxxx1372  GEM/MOHAWK PO BOX 981439 EL PASO, TX 79968	H		Opened 1/01/08 Last Active 6/17/09 CHARGE ACCOUNT				5,827.00
Subtotal (Total of this page)							87,517.00

Sheet no. 3 of 5 sheets attached to Schedule of  
Creditors Holding Unsecured Nonpriority Claims

BKF (Official Form 67) (12/97) - Cont.

In re **JOHN M LEFEBVRE,  
NOOJAN BRICHAMPHA**Case No. 10-12503

Debtors  
**SCHEDULE F - CREDITORS HOLDING UNSECURED NONPRIORITY CLAIMS**  
 (Continuation Sheet)

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE, AND ACCOUNT NUMBER (See instructions above.)	H W C	Husband, Wife, Joint, or Community	DATE CLAIM WAS INCURRED AND CONSIDERATION FOR CLAIM. IF CLAIM IS SUBJECT TO SETOFF, SO STATE.	C O N T R I B U T I O N	U N S E C U R E D	D I S C U S S E D	AMOUNT OF CLAIM
Account No.  KRYSTYNA STETKIEWICZ 3663 CALLAHAN AVE Las Vegas, NV 89120		C	2008-2009 CREDIT CHARGES			X	62,320.00
Account No. LEFEBVRE  MAGNUM OPES SUNSET CORP CENTER 4666 JUDSON AVE. STE. 110 Las Vegas, NV 89116		C	2009 BUSINESS DEBT				367,482.90
Account No.  SPRING VALLEY HOSPITAL PO BOX 31001-0827 Pasadena, CA 91110-0827		C	12/09 MEDICAL TREATMENT				Unknown
Account No.  ST ROSE DOMINICAN HOSPITAL FILE BOX 57124 Los Angeles, CA 90074		C	12/09 MEDICAL TREATMENT				Unknown
Account No. 7438  US AIRWAYS MASTERCARD PO BOX 13337 Philadelphia, PA 19101		C	2009 CREDIT CARD PURCHASES				30,684.75
Sheet no. <u>4</u> of <u>5</u> sheets attached to Schedule of Creditors Holding Unsecured Nonpriority Claims							Subtotal (Total of this page) <b>460,437.65</b>



367 (Official Form 67) (12/07) - Cont.

In re **JOHN M LEFEBVRE,  
NOOJAN SRECHAMPHA**Case No. 10-12503

Debtors  
**SCHEDULE F - CREDITORS HOLDING UNSECURED NONPRIORITY CLAIMS**  
(Continuation Sheet)

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE, AND ACCOUNT NUMBER (See instructions above.)	C O D E S O R	H W J C	Husband, Wife, Joint, or Community	DATE CLAIM WAS INCURRED AND CONSIDERATION FOR CLAIM. IF CLAIM IS SUBJECT TO SETOFF, SO STATE.	CLAIM STATUS			AMOUNT OF CLAIM	
					CONTINGENT	UNLIQUIDATED	DISPUTED		
Account No. xxxxxxxx8630  US BK RMS CC 101 5TH ST E STE A SAINT PAUL, MN 55101		H		Opened 7/01/04 Last Active 5/28/08 CREDIT CARD PURCHASES				23,800.00	
Account No. xxxxxxxx8675  US BK RMS CC 101 5TH ST E STE A SAINT PAUL, MN 55101		C		Opened 7/01/04 Last Active 5/21/08 CREDIT CARD PURCHASES				23,025.00	
Account No. xxxxxxxx00001109  WELLS FARGO BANK P.O. BOX 8445 PORTLAND, OR 97208		H		Opened 9/08/04 Last Active 1/26/10 CREDIT CARD PURCHASES				181.00	
Account No. 3264  WELLS FARGO BUSINESS DIRECT PO BOX 348780 Sacramento, CA 95834		X C		2008 BUSINESS LOAN				89,820.14	
Account No.  									
Sheet no. <u>5</u> of <u>5</u> sheets attached to Schedule of Creditors Holding Unsecured Nonpriority Claims								Subtotal (Total of this page)	137,006.14
								Total (Report on Summary of Schedules)	1,013,162.45

## **EXHIBIT 5**

B6H (Official Form 6H) (12/07)

In re **JOHN M LEFEBVRE,  
NOOJAN SRIKHAMPHA**

Case No. \_\_\_\_\_

Debtors

**SCHEDULE H - CODEBTORS**

Provide the information requested concerning any person or entity, other than a spouse in a joint case, that is also liable on any debts listed by debtor in the schedules of creditors. Include all guarantors and co-signers. If the debtor resides or resided in a community property state, commonwealth, or territory (including Alaska, Arizona, California, Idaho, Louisiana, Nevada, New Mexico, Puerto Rico, Texas, Washington, or Wisconsin) within the eight year period immediately preceding the commencement of the case, identify the name of the debtor's spouse and of any former spouse who resides or resided with the debtor in the community property state, commonwealth, or territory. Include all names used by the nondebtor spouse during the eight years immediately preceding the commencement of this case. If a minor child is a codebtor or a creditor, state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See, 11 U.S.C. §112 and Fed. R. Bankr. P. 1007(m).

☐ Check this box if debtor has no codebtors.

NAME AND ADDRESS OF CODEBTOR	NAME AND ADDRESS OF CREDITOR
<b>KRYSTYNA STETKIEWICZ 3653 CALLAHAN AVE Las Vegas, NV 89120</b>	<b>BANK OF AMERICA PO BOX 851001 Dallas, TX 75285</b>
<b>KRYSTYNA STETKIEWICZ 3653 CALLAHAN AVE Las Vegas, NV 89120</b>	<b>CHASE PO BOX 94014 Palatine, IL 60094</b>
<b>KRYSTYNA STETKIEWICZ 3653 CALLAHAN AVE Las Vegas, NV 89120</b>	<b>CITICARDS PO BOX 6000 The Lakes, NV 89163</b>
<b>KRYSTYNA STETKIEWICZ 3653 CALLAHAN AVE Las Vegas, NV 89120</b>	<b>US BANK PO BOX 790408 Saint Louis, MO 63179</b>
<b>KRYSTYNA STETKIEWICZ 3653 CALLAHAN AVE Las Vegas, NV 89120</b>	<b>WELLS FARGO BUSINESS DIRECT PO BOX 348750 Sacramento, CA 95834</b>

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continuation sheets attached to Schedule of Codebtors

**EXHIBIT 6**

**2. Income other than from employment or operation of business**

None



State the amount of income received by the debtor other than from employment, trade, profession, or operation of the debtor's business during the **two years** immediately preceding the commencement of this case. Give particulars. If a joint petition is filed, state income for each spouse separately. (Married debtors filing under chapter 12 or chapter 13 must state income for each spouse whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

AMOUNT	SOURCE
\$17,857.00	2007 SOCIAL SECURITY
\$18,298.00	2008 SOCIAL SECURITY
\$11,390.00	2009 SOCIAL SECURITY
\$3,616.00	YTD

**3. Payments to creditors**

None



*Complete a. or b., as appropriate, and c.*

a. *Individual or joint debtor(s) with primarily consumer debts.* List all payments on loans, installment purchases of goods or services, and other debts to any creditor made within **90 days** immediately preceding the commencement of this case unless the aggregate value of all property that constitutes or is affected by such transfer is less than \$600. Indicate with an (\*) any payments that were made to a creditor on account of a domestic support obligation or as part of an alternative repayment schedule under a plan by an approved nonprofit budgeting and creditor counseling agency. (Married debtors filing under chapter 12 or chapter 13 must include payments by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF CREDITOR	DATES OF PAYMENTS	AMOUNT PAID	AMOUNT STILL OWING
---------------------------------	----------------------	-------------	-----------------------

None



b. *Debtor whose debts are not primarily consumer debts:* List each payment or other transfer to any creditor made within **90 days** immediately preceding the commencement of the case unless the aggregate value of all property that constitutes or is affected by such transfer is less than \$5,475. If the debtor is an individual, indicate with an asterisk (\*) any payments that were made to a creditor on account of a domestic support obligation or as part of an alternative repayment schedule under a plan by an approved nonprofit budgeting and creditor counseling agency. (Married debtors filing under chapter 12 or chapter 13 must include payments by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF CREDITOR	DATES OF PAYMENTS/ TRANSFERS	AMOUNT PAID OR VALUE OF TRANSFERS	AMOUNT STILL OWING
WELLS FARGO HM MORTGAG 8480 STAGECOACH CIR FREDERICK, MD 21701	NOV, DEC, JAN	\$5,241.18	\$217,777.00
DCFS USA LLC 2050 ROANOKE RD WESTLAKE, TX 76262	NOV, DEC, JAN	\$1,938.00	\$6,106.00

None



c. *All debtors:* List all payments made within **one year** immediately preceding the commencement of this case to or for the benefit of creditors who are or were insiders. (Married debtors filing under chapter 12 or chapter 13 must include payments by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF CREDITOR AND RELATIONSHIP TO DEBTOR	DATE OF PAYMENT	AMOUNT PAID	AMOUNT STILL OWING
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**4. Suits and administrative proceedings, executions, garnishments and attachments**

None



a. List all suits and administrative proceedings to which the debtor is or was a party within **one year** immediately preceding the filing of this bankruptcy case. (Married debtors filing under chapter 12 or chapter 13 must include information concerning either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

CAPTION OF SUIT AND CASE NUMBER	NATURE OF PROCEEDING	COURT OR AGENCY AND LOCATION	STATUS OR DISPOSITION
------------------------------------	----------------------	---------------------------------	--------------------------